

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,
Plaintiffs,**

v.

**BRAD RAFFENSPERGER, ET AL.,
Defendants.**

Civil Action No. 1:17-CV-2989-AT

PLAINTIFFS' JOINT NOTICE IN ADVANCE OF HEARING

Pursuant to this Court's Order (Dkt. No. 794), Plaintiffs file this joint submission on the record in advance of the hearing set for September 2, 2020, at 10:00 a.m. ET (which Plaintiffs understand may be rescheduled to the following week).

Plaintiffs advise that they currently anticipate calling the following live witnesses at the hearing. For the witnesses identified for cross examination below, Plaintiffs anticipate calling those witnesses affirmatively but will cross-examine as adverse witnesses.

Witness	Subject of Testimony	Estimated Time
Harri Hursti <i>Founding Partner, Nordic Innovation Labs</i>	Election security and public interest element of the preliminary injunction request.	<u>Direct</u> : 20-30 minutes
Philip Stark <i>Associate Dean of Mathematical and Physical Sciences, University of California, Berkeley</i>	Public interest element of the preliminary injunction request.	<u>Direct</u> : 20-30 minutes
Rhonda Martin <i>Fulton County Voter</i>	Public interest element of the preliminary injunction request.	<u>Direct</u> : 20 minutes
Jeanne Dufort <i>Morgan County Voter</i>	Public interest element of the preliminary injunction request.	<u>Direct</u> : 15 minutes
Alex Halderman <i>Professor of Computer Science and Engineering at the University of Michigan</i>	Election security and public interest element of the preliminary injunction request.	<u>Direct</u> : 20-30 minutes
Michael Barnes <i>Employee, Secretary of State Elections Division Former Director of Center for Election Systems at Kennesaw State University</i>	Election security and public interest element of the preliminary injunction request.	<u>Cross</u> : 20 minutes

Witness	Subject of Testimony	Estimated Time
Gabriel Sterling <i>Voting Implementation Manager, Secretary of State for the State of Georgia</i>	Election security and public interest element of the preliminary injunction request.	<u>Cross:</u> 20 minutes
Chris Harvey <i>Elections Director, Secretary of State for the State of Georgia</i>	Election security and public interest element of the preliminary injunction request.	<u>Cross:</u> 20 minutes
Richard Barron <i>Director, Registration and Elections, Fulton County, Georgia</i>	Election security and public interest element of the preliminary injunction request.	<u>Cross:</u> 20 minutes
Merritt Beaver <i>Chief Information Officer, office of the Secretary of State for the State of Georgia</i>	Election security and public interest element of the preliminary injunction request.	<u>Cross:</u> 20 minutes
Dr. Juan Gilbert <i>Chair, Department of Computer & Information Science, Herbert Wertheim College of Engineering, Gainesville, Florida</i>	Election security and public interest element of the preliminary injunction request.	<u>Cross:</u> 20 minutes
Dominion Voting Systems Corporation <i>Witness to be provided pursuant to Federal Rule of Evidence 30(b)(6)</i>	Election security and public interest element of the preliminary injunction request.	<u>Cross:</u> 30 minutes

Plaintiffs reserve the right to call additional witnesses (and amend the time estimates above) as discovery develops and briefing is completed on the underlying motions, and to cross-examine any witness called by any party within the total time allotted per side (or per Plaintiffs' group, as applicable).

Respectfully submitted this 24th day of August, 2020.

/s/ David D. Cross

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CERTIFICATE OF COMPLIANCE

Pursuant to LR 7.1(D), I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14.

/s/ David D. Cross
David D. Cross

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CERTIFICATE OF SERVICE

I hereby certify that on August 24, 2020, a copy of the foregoing **PLAINTIFFS' JOINT NOTICE IN ADVANCE OF HEARING** was electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send notification of such filing to all attorneys of record.

/s/ David D. Cross
David D. Cross